

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
3                   EASTERN DIVISION

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4                   MARQUIS TILMAN, )  
5                   )  
6                   Plaintiff, )  
7                   )  
8                   VS. ) NO. 2:20-CV-10-KS-MTP  
9                   )  
10                  )  
11                  CLARKE COUNTY, et al., )  
12                  )  
13                  )  
14                  Defendant. )  
15                  )  
16                  )

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17                   DEPOSITION

18                   OF

19                   ANTHONY CHANCELOR

20                   SEPTEMBER 30, 2021

21  
22                  ALPHA REPORTING CORPORATION  
23                  236 Adams Avenue  
24                  Memphis, TN 38103  
25                  901-523-8974  
26                  www.alphareporting.com



1                   The deposition of ANTHONY CHANCELOR, taken  
2 on this, the 30th day of September 2021, on behalf  
3 of the Plaintiff, pursuant to notice and consent of  
4 counsel, beginning at approximately 11:00 a.m. via  
5 Zoom video conference.

6                   This deposition is taken pursuant to the  
7 terms and provisions of the Federal Rules of Civil  
8 Procedure.

9                   All forms and formalities, excluding the  
10 signature of the witness, are waived, and objections  
11 alone as to matters of competency, irrelevancy and  
12 immateriality of the testimony are reserved to be  
13 presented and disposed of at or before the hearing.

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A P P E A R A N C E S  
4

5 FOR THE PLAINTIFF: CARLOS E. MOORE, ESQ.  
6  
7  
8  
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## EXAMINATION INDEX

3 ANTHONY CHANCELOR

## EXHIBIT INDEX

EXHIBIT NO. 1 STATEMENT

22

25 REPORTER'S CERTIFICATE . . . . . 43

1                   ANTHONY CHANCELOR,  
2 having first been duly sworn, was examined and  
3 testified as follows:  
4

5  
6                   EXAMINATION  
7

8                   BY MR. MOORE:

9                   Q. My name is Carlos Moore. I represent  
10 Marquis Tilman in this lawsuit. I will be asking  
11 you questions on behalf of Mr. Tilman this morning.

12                  Have you given a deposition before?

13                  A. I have not. I have not.

14                  Q. Okay. I'll give you the ground rules.  
15 Continue to answer verbally so Andrea can get down  
16 everything correctly. When I'm talking I'm going to  
17 ask that you not talk over me and when you're  
18 talking I'll not talk over you. Can we have that  
19 agreement?

20                  A. Yes, sir.

21                  Q. If you need to take a break let me know and  
22 we will allow you to take a break. If there's a  
23 pending question I'll ask that you answer that  
24 question before taking a break.

25                  A. Yes, sir.

26                  Q. I have a tendency to talk fast. If you  
27 don't understand me let me know and I will repeat

1 or rephrase the question. Okay?

2 A. Yes.

3 Q. I will assume you understood the question if  
4 in fact you answer it. Is that fair enough?

5 A. Yes, sir. Excuse me. I've got a little bit  
6 of a cough. I had COVID about a three weeks ago.  
7 That cough is hanging in there with me for whatever  
8 reason.

9 Q. I'm glad we are doing this virtually.

10 A. Yes, sir. I'm clear now.

11 Q. State your name.

12 A. Anthony Chancelor.

13 Q. Have you ever gone by any other name or  
14 alias?

15 A. No, sir.

16 Q. All right. What is your address?

17 A. [REDACTED], Enterprise, Mississippi  
18 39330.

19 Q. How long you lived at that address?

20 A. I've actually lived at that address about  
21 seven months. It's a rental right now.

22 Q. All right. Does anyone live there with you?

23 A. They do.

24 Q. Who lives with you?

25 A. My wife and my children.

1 Q. What's your wife's name?  
2 A. Mallory.  
3 Q. What's her last name?  
4 A. Chancelor.  
5 Q. Maiden name?  
6 A. Todd.  
7 Q. How long have y'all been married?  
8 A. For three years.  
9 Q. Do you have any adult children?  
10 A. I do not.  
11 Q. Okay. How many children do you have?  
12 A. Five.  
13 Q. Five children in three years?  
14 A. Well, it's hers, mine and ours.  
15 Q. Okay. All right. What is your date of  
16 birth?  
17 A. [REDACTED].  
18 Q. How old are you?  
19 A. 35.  
20 Q. What's your phone number?  
21 A. [REDACTED].  
22 Q. What county is Enterprise in?  
23 A. Clarke.  
24 Q. Do you have other relatives in Clarke County  
25 or south Mississippi besides your wife and children?

1 A. I do.

2 Q. Tell me about that. Who are your parents?

3 A. Tony and Kim Chancelor. They also live in

4 Enterprise.

5 Q. Okay. Those are your parents that live in

6 Enterprise. What about siblings?

7 A. I have a brother and sister who live in

8 Quitman which is also in Clarke County.

9 Q. What are their names?

10 A. Ansel is my brother and Madeline Miller is

11 my sister.

12 Q. Who is Madeline married to?

13 A. Jason Miller.

14 Q. Where is Jason from?

15 A. Quitman.

16 Q. Okay. Is your brother married?

17 A. He is.

18 Q. What is wife's name?

19 A. Jessica.

20 Q. Jessica Chancelor?

21 A. Yes, sir.

22 Q. All right. Any adult nieces and nephews?

23 A. No, sir.

24 Q. Any living grandparents?

25 A. I do.

1 Q. All right. In the south Mississippi area?

2 A. Clarke County.

3 Q. Give me those names.

4 A. Clovis Chancelor. That is my father's  
5 mother evidently.

6 Q. All right. So your paternal grandmother?

7 A. Paternal grandmother, yes, sir.

8 Q. Go ahead.

9 A. No more grandparents.

10 Q. Any great grandparents that are living?

11 A. No, sir.

12 Q. You got aunts and uncles?

13 A. Yes, sir.

14 Q. All right. Give me their last name or their  
15 surnames.

16 A. I've got Joey Chancelor, lives in Clarke  
17 County. Clay Chancelor lives in Clarke County.  
18 You just want everybody in Clarke County?

19 Q. South Mississippi and the surrounding area.

20 A. South Mississippi. Okay.

21 Q. Just give me the last names. Chancelor and  
22 what else?

23 A. Chancelor.

24 Q. Okay. What is your --

25 A. Those are the only ones on my dad's side --

1 on my dad's side that live here. My mother -- I  
2 don't have any aunts and uncles on my mother's side.

3 Q. What's your mother's maiden name?

4 A. Cooper.

5 Q. Do your in-laws live in that general area?

6 A. They do not.

7 Q. Where is your wife from?

8 A. Lauderdale County.

9 Q. All right. So Lauderdale County is still in  
10 south Mississippi. Are her folks in Lauderdale  
11 County?

12 A. They are in Kemper County actually is where  
13 they live, one county north.

14 Q. That's still going to be in possible jury  
15 voir dire. Her last name was Todd?

16 A. Todd.

17 Q. What her mother's last name?

18 A. Todd.

19 Q. Her mother was a Todd before she got  
20 married?

21 A. I thought you meant currently. Her  
22 mother -- my mind just went blank. That's bad.  
23 Clark. I'm sorry. Clark. She was a Clark. I had  
24 that think about that a minute.

25 Q. All right. So Todds and Clarks would be in

1       your in-laws in the southern Mississippi area. Can  
2       you think of any other last names?

3           A. Martins.

4           Q. Okay.

5           A. I'm kin to Martins. Basically Martins and  
6       Chancelors, those would be the main.

7           Q. Okay. I got it. Have you ever been  
8       convicted of any crime?

9           A. No, sir.

10          Q. Have you ever been arrested?

11          A. No, sir.

12          Q. Have you ever been sued before?

13          A. No, sir.

14          Q. Have you ever been married prior to being  
15       married to Mallory?

16          A. I have.

17          Q. How many times?

18          A. Once.

19          Q. Who was the lucky lady?

20          A. Her name is Emily Stevens.

21          Q. All right. What did she go by when she was  
22       married?

23          A. Emily Chancelor.

24          Q. What is her maiden name?

25          A. Stevens.

1 Q. How long were you married?  
2 A. Eight years.  
3 Q. Any children with her?  
4 A. Two.  
5 Q. Okay. Where does she reside now?  
6 A. In Enterprise, Clarke County.  
7 Q. All right. Did you divorce her or did she  
8 divorce you?  
9 A. I divorced her.  
10 Q. Okay. Have you ever sued anyone else?  
11 A. I have not.  
12 Q. Have you ever been sued prior to this  
13 lawsuit?  
14 A. No, sir.  
15 Q. All right. Or afterward?  
16 A. No, sir. I've never been sued.  
17 Q. Have you ever filed bankruptcy?  
18 A. No, sir.  
19 Q. Worker's comp claim?  
20 A. Sir?  
21 Q. Have you ever filed a worker's compensation  
22 claim?  
23 A. No, sir.  
24 Q. What high school did you graduate from?  
25 A. Enterprise.

1 Q. What year?  
2 A. 2004.  
3 Q. Did you play any sports in high school?  
4 A. I did.  
5 Q. Okay. What did you play?  
6 A. Basketball and golf.  
7 Q. All right. Did you go to college?  
8 A. Some. I'm actually still in college  
9 actually.  
10 Q. Which college did you go to?  
11 A. Meridian Community College.  
12 Q. Still there?  
13 A. I am.  
14 Q. What's your major?  
15 A. Right now I'm just trying to do a university  
16 transfer. It's liberal arts.  
17 Q. Where are you planning to go?  
18 A. Mississippi State. It's across the street.  
19 It's a State branch.  
20 Q. Okay. What documents, if any, did you  
21 review in preparation for today's deposition?  
22 A. My statement.  
23 Q. All right. Anything else?  
24 A. No, sir.  
25 Q. Who, if anyone, did you speak with in

1 preparation for today's deposition besides your  
2 lawyer?

3 A. That's it.

4 Q. Do you have any military experience?

5 A. No, sir.

6 Q. Did you go to the law enforcement academy?

7 A. I did.

8 Q. Tell me about that.

9 A. I went to the Mississippi Law Enforcement  
10 Officers Training Academy in Jackson.

11 Q. In?

12 A. 2007.

13 Q. Did you successfully complete that?

14 A. Yes, sir.

15 Q. Tell me about every law enforcement job  
16 you've since you left the academy.

17 A. We may be here for a while. I worked for  
18 the sheriff here in Clarke County.

19 Q. Clarke County sheriff?

20 A. Yes, sir. I worked for the Mississippi  
21 Highway Patrol.

22 Q. Okay.

23 A. And the sheriff. Those are my law  
24 enforcement career.

25 Q. Who are you working for now?

1           A. The Mississippi Highway Patrol, the  
2         Department of Public Safety.

3           Q. What's your position?

4           A. I do governmental affairs. I work in  
5         Jackson.

6           Q. How did you get that position?

7           A. I got lucky.

8           Q. How long have you had it?

9           A. One year.

10          Q. Who appointed you?

11          A. Colonel Randy Higgin.

12          Q. Okay. What was your first position with  
13         highway patrol?

14          A. Trooper.

15          Q. How long were you a trooper?

16          A. I served as a road trooper for about 11  
17         years before I got this position.

18          Q. Okay. How long were you with Clarke County  
19         Sheriff's Department?

20          A. Total of about probably three and a half to  
21         four clear years collectively.

22          Q. What year were you with sheriff's  
23         department?

24          A. I was with the sheriff's office right out of  
25         high school in 2004 as a 9-1-1 operator. I was with

1 the sheriff's office as a deputy in 2006 prior to  
2 going to highway patrol -- highway patrol school  
3 then. And then in 2014 I went back to work for the  
4 sheriff's office. I'm sorry. This is a lot to try  
5 to -- I mean, it is what it is.

6 I went to back to work for the sheriff's office  
7 for two years. Then I went to highway patrol again  
8 for a little while up until 2018 and I come back to  
9 the sheriff's office for a year. And then I had an  
10 opportunity at the highway patrol to eventually get  
11 the position I'm in and I went back to the patrol.  
12 I know that's convoluted. I apologize. It is what  
13 it is.

14 Q. So you were working for the sheriff's  
15 department on the date of this incident with  
16 Mr. Tilman on 3/21/19?

17 A. I was working for the sheriff's office  
18 whenever the incident took place. Yes.

19 Q. Okay. Have you ever been fired from a job?

20 A. No, sir.

21 Q. Have you ever been forced to resign?

22 A. No, sir.

23 Q. Have you ever been disciplined on the job?

24 A. Yes, sir.

25 Q. Tell me about that.

1           A. Well, one night I was on call for the  
2 highway patrol and my cell phone quit working in the  
3 middle of the night, like, it got out of service  
4 inside my house. They called me out to a wreck and  
5 I couldn't -- I didn't get the call and another  
6 trooper had to go. I was disciplined for that.

7           Q. What kind of discipline did you get?

8           A. I got a write-up.

9           Q. How did that make you feel?

10          A. You know, it was my fault. It was my fault.  
11 So it is what it is. There's got to be checks and  
12 balances.

13          Q. When was that write-up given?

14          A. About 2012 maybe.

15          Q. Did that have any reason for you leaving the  
16 highway patrol at some point?

17          A. Sir?

18          Q. Did that have any part of you leaving the  
19 highway patrol at some point?

20          A. No, sir.

21          Q. Any other write-up or disciplinary action on  
22 any other job?

23          A. No, sir. No, sir.

24          Q. Any other post secondary education besides  
25 Meridian Community College and the law enforcement

1 academy?

2 A. No, sir.

3 Q. You said no military service?

4 A. Yes, sir, no military service.

5 Q. What was your last rank with the Clarke  
6 County Sheriff's Department?

7 A. Just deputy.

8 Q. What were your job duties as a sheriff's  
9 deputy?

10 A. Answer calls for service, just the patrol  
11 the county.

12 Q. Serve papers?

13 A. We did serve some papers, yes, sir.

14 Q. Were you a sworn officer?

15 A. Yes, sir.

16 Q. Who did you report to?

17 A. Chief Deputy Barry White.

18 Q. Anyone else?

19 A. No, sir.

20 Q. Did you supervise anyone?

21 A. No, sir.

22 Q. Okay. Have you ever been accused of  
23 excessive force?

24 A. No, sir.

25 Q. Besides this one case?

1 A. Yes, sir.

2 Q. Have you ever been the subject of any

3 internal affair investigation?

4 A. No, sir.

5 Q. Do black lives matter?

6 A. Yes, sir.

7 Q. Have you ever used the "N" word?

8 A. No, sir.

9 Q. When I say the "N" word you know what I'm

10 talking about?

11 A. Yes, sir.

12 Q. You're certain you never used it?

13 A. Yes, sir, I'm certain.

14 Q. Okay. I appreciate your certainty because

15 some of your colleagues are not certain. Have you

16 ever been a member of any racially exclusive group?

17 A. No, sir.

18 Q. Do you have any black friends?

19 A. I do.

20 Q. How many do you have?

21 A. Many. I have no idea. A bunch. Several.

22 I mean --

23 Q. Tell me their names.

24 A. Sure. Charles Haynes, I eat lunch with him

25 at least three or four times a week.

1 Q. Where does Charles work?  
2 A. He works at MBI.  
3 Q. MBI?  
4 A. Yes.  
5 Q. Okay. Any other black friends that come  
6 mind?  
7 A. Bo Lewis; Tessa Harris; Marvin Henderson, me  
8 and him actually shared an apartment, me and him  
9 lived together.  
10 Q. Who does he work for?  
11 A. He works for MBI.  
12 Q. I think I've dealt with him before.  
13 A. He's a good dude.  
14 Q. Tessa Harris, who is that?  
15 A. She is out of Smith County, Smith County.  
16 She actually is an associate of some of my family.  
17 Q. Okay. And Bo Lewis?  
18 A. Bo Lewis.  
19 Q. He is out of Jackson or where?  
20 A. He's out of Jackson. He lives around  
21 Jackson.  
22 Q. He's MBI, too?  
23 A. Yes, sir. Gary Kelly, he works here at the  
24 sheriff's office, I consider him to be a friend of  
25 mine.

1 Q. Do black friends ever visit in your home?

2 A. Roy -- (inaudible) -- I forgot about him.

3 Lord, we've hung out on a couple of different  
4 occasions.

5 Q. Do you know Marquis Tilman?

6 A. I do.

7 Q. How do you know him?

8 A. Just from here in the county.

9 Q. Okay. What kind of interactions did you  
10 have with him before 3/21/19?

11 A. I don't recall. I was actually trying to  
12 rack my remember trying to remember what dealings I  
13 personally have had with him, just in and out, you  
14 know, around the county.

15 Q. All right. Do you have any knowledge of  
16 pursuit of him on 3/21/19 by sheriff's deputies?

17 A. In March of 2019, yes, sir, we were in  
18 pursuit with him.

19 Q. Did you do a statement or report?

20 A. I did.

21 Q. Of those interactions? I'm going to show  
22 you a document and can you tell me if this is your  
23 signature?

24 A. Yes, sir, it is.

25 Q. Is it dated 3/21/19?

1 A. It is. It is.

2 Q. All right. This is your statement you did  
3 in reference to the incident?

4 A. Yes, sir.

5 Q. All right. We are going to mark that as  
6 Exhibit 1 to his deposition. That will be Anthony  
7 Chancelor's statement.

8 (WHEREUPON, THE ABOVE-REFERENCED DOCUMENT WAS  
9 MARKED AS EXHIBIT NO. 1 TO THE DEPOSITION AND WAS  
10 RETAINED BY COUNSEL.)

11 BY MR. MOORE:

12 Q. Who asked you to write this report?

13 A. Nobody. I just took it upon myself to.

14 Q. All right. You just write like that?

15 A. Sir?

16 Q. You just write like that -- smart like that?

17 A. I mean, I wouldn't call it smart. I'm just  
18 trying to be responsible when it comes to taking  
19 care of your business.

20 Q. Okay. It says 1730. So is that 5:30 p.m.?

21 A. 5:30, yes. 1730 is 5:30, yes, sir.

22 Q. What time did the chase take place?

23 A. What time did the chase take place? Earlier  
24 that day but I know that I apparently left the time  
25 off. When it says look at the top -- the time it

1 says approximately and I left the time off. I  
2 remember it being earlier that day around school  
3 traffic time or just prior to.

4 Q. The morning traffic or afternoon traffic of  
5 school?

6 A. Afternoon traffic.

7 Q. All right. So that would've been sometime  
8 between 2:00 and 3:00?

9 A. Yes, sir, in that time frame.

10 Q. Okay. Tell me in your own words what you  
11 recall in relation to the incident or Marquis Tilman  
12 or anything involving him on 3/21/19.

13 A. Agent Ivy initiated the pursuit with him,  
14 left the city of Quitman. I joined in the pursuit  
15 probably just shy of Highway 514 on 45. The  
16 gentleman -- the high points, he hit my vehicle, run  
17 me off the road, went back south. Then we got  
18 going, I rammed his vehicle, Ben rammed his vehicle  
19 and then I shot his front right tire out to make  
20 sure he didn't go anywhere. And he dove out of the  
21 vehicle and then we got him in handcuffs he went to  
22 jail.

23 Q. How did he get out of the vehicle?

24 A. Just head first. He was head first.

25 Q. Okay. And what portion of his body hit the

1 ground?

2 A. Maybe his -- like this area.

3 Q. Torso? Chest?

4 A. I would say so, yes.

5 Q. Where did his hands go?

6 A. Directly underneath, towards the center,  
7 like, underneath like this.

8 Q. And did you see anything in his hands?

9 A. Did not, could not see his hands at the  
10 time.

11 Q. What happened next?

12 A. He tensed up. Of course, he didn't -- just  
13 not wanting to get in handcuffs. And then myself  
14 and Billy Lewis -- which he was kind of -- he was  
15 facing opposite of the highway, facing towards --  
16 like toward the tree line I guess you would say. So  
17 I would've been on his -- on this side of him, on  
18 his left and Billy would've been on his right. He  
19 was able to get his hands out from under him and I  
20 believe Justin Ross actually got him in handcuffs.

21 Q. And was he assaulted by any other deputies  
22 before he was put in handcuffs?

23 A. No, sir.

24 Q. Was he assaulted after he was put in  
25 handcuffs?

1 A. No, sir.  
2 Q. Isn't it true that he was stomped?  
3 A. No, sir.  
4 Q. Hit?  
5 A. No, sir.  
6 Q. Punched?  
7 A. No.  
8 Q. Kneed?  
9 A. Sir?  
10 Q. Kneed?  
11 A. No, sir.  
12 Q. Repeatedly causing severe injuries to his  
13 face, eyes, chest?  
14 A. No, sir.  
15 Q. Did any of that happen?  
16 A. No, sir, it did not happen.  
17 Q. You think he just made it up?  
18 A. I beg your pardon.  
19 Q. You think Mr. Tilman made all of this up?  
20 A. Yes.  
21 Q. Why do you think he made it up?  
22 A. Because he doesn't like us.  
23 Q. Okay. Did he make up Sheriff Kemp going on  
24 the audio, radio saying beat his ass?  
25 A. No.

1 Q. Did you hear that over the radio?

2 A. I did.

3 Q. Okay. So we know he can tell some of the  
4 truth, correct?

5 A. Well, someone would've had to told him that.  
6 I don't know how he would have heard it.

7 Q. I didn't say he heard it. I said it's a  
8 fact that Sheriff Kemp said it over the radio? You  
9 can't deny that, can you?

10 A. No, no, no.

11 Q. He said shut it down and beat his ass,  
12 didn't he?

13 A. Yes.

14 Q. That's what y'all did, beat his ass?

15 A. No.

16 Q. You disobeyed a command of your superior  
17 officer?

18 A. I did.

19 Q. Were you trained to do that?

20 A. No.

21 Q. Why didn't you beat his ass?

22 A. That's not the right thing to do.

23 Q. How do you know it was not the right thing  
24 to do?

25 A. Because I was raised better than that.

1           Q. Okay. And the person that paid you told you  
2 to do something and you refused to do it?

3           A. Do what now?

4           Q. The person that paid you at that time told  
5 you to do something and you refused to do it?

6           A. If it's not the correct thing to do, then  
7 no.

8           Q. Did you have a fear of being terminated?

9           A. No, sir.

10          Q. Why didn't you fear being terminated?

11          A. I just did not.

12          Q. Okay. Did you feel you could find another  
13 job?

14          A. I guess so.

15          Q. Did he say with a stern voice or was he  
16 joking or was he serious? How did he tell you to  
17 beat this man's ass?

18          A. I mean, he had a stern voice on the radio  
19 but it was in the heat of the moment I'm sure. I  
20 mean, this guy has done run me off the road with his  
21 vehicle. You know, it was kind of getting serious.  
22 So I'm sure he was just -- it was in the heat of the  
23 moment I guess.

24          Q. Even after he ran you off the road you did  
25 not say beat his ass, did you?

1 A. Huh-huh (negative response).

2 Q. You were better than that, correct?

3 A. I wouldn't say I'm better than that. Maybe

4 I could control my temper maybe. I don't know.

5 Q. And anybody -- (inaudible) -- should be able

6 to control their temper, correct?

7 A. Yes, sir.

8 Q. Because you have other people following you

9 potentially?

10 A. Yes, sir.

11 Q. Some of those people could have been

12 impressionable, some people in their 20s that were

13 on the force and under the command of the sheriff

14 that may have been impressionable and may have taken

15 that command literally, correct?

16 A. Yes, sir.

17 Q. That would have been a travesty, correct?

18 A. Yes, sir.

19 Q. Do you know no one took it seriously and

20 beat his ass based on the command?

21 A. Yes, I know that.

22 Q. How do you know that?

23 A. Because I was there.

24 Q. For that entire time?

25 A. Yes, sir.

1 Q. For that entire time?

2 A. Yes.

3 Q. Did you get any licks?

4 A. No, sir.

5 Q. You did not?

6 A. No, sir.

7 Q. Why not?

8 A. Because he didn't need it.

9 Q. Did you have a body camera on?

10 A. I did not.

11 Q. Were there any cameras in the vehicles?

12 A. No, sir.

13 Q. All right. Did this man require any kind of

14 paramedic treatment or hospital treatment after his

15 interaction with law enforcement?

16 A. I do not recall.

17 Q. Do you remember how he looked after he was

18 put in handcuffs?

19 A. No, sir, I do not.

20 Q. Was anything wrong with your eyes?

21 A. No, sir.

22 Q. All right. So why don't you remember how he

23 looked?

24 A. I mean, what do you mean? What part of him

25 are you talking about?

1           Q. Any portion of his body. Did he appear  
2         injured?

3           A. Seems like something was wrong with his leg  
4         or something because he had been in a wreck. He had  
5         been a wreck in the city of -- (inaudible) -- I  
6         think prior to, like, a week before this happened I  
7         think.

8           Q. What about his face? What about his face?

9           A. I don't recall. I don't remember anything  
10        about his face.

11          Q. What about his breathing?

12          A. He said he was kind of having trouble  
13        breathing but, I mean, of course we was able to get  
14        him set up straight and handcuffed, you know.

15          Q. Do you know why he had trouble breathing?

16          A. He might have been upset I mean because he  
17        had been in three vehicle accidents in about 10  
18        minutes.

19          Q. Or he might have just had his ass beat and  
20        was out of breath, correct?

21          A. No, sir.

22          Q. Did anybody put their weight on his back  
23        while he was on the ground?

24          A. No, sir.

25          Q. You didn't see that?

1 A. No, sir.

2 Q. Okay. One of your colleagues said somebody  
3 put their weight on his back -- Billy Lewis put his  
4 weight on his back to try to get him to remove his  
5 hands from near his waist so he could put him in  
6 handcuffs. Did you see that?

7 A. I don't recall his Billy having his knee in  
8 his back. He had it on his shoulder.

9 Q. All right. Well, a shoulder is in the back,  
10 correct?

11 A. His shoulder is not his back. I consider it  
12 being the center right here.

13 Q. Are you a doctor?

14 A. I'm not. Maybe that's why I consider this  
15 to be his shoulder.

16 Q. The shoulder is in the back of his -- the  
17 shoulder is in the back, correct? He was laying  
18 face first on the ground?

19 A. Yes, sir.

20 Q. So he --

21 A. Billy Lewis had his weight on some of his  
22 shoulder.

23 Q. On this back of his shoulder, correct?

24 A. Yes.

25 Q. Okay. Let's make sure we have a clear

1 understanding because you are under oath, correct?

2 A. Yes, sir. Yes, sir.

3 Q. And how much does Billy weigh approximately?

4 A. I have no idea.

5 Q. Billy is not the lightest man out there, is  
6 he?

7 A. No, sir, he's not.

8 Q. And he was bigger than Mr. Tilman, was he  
9 not?

10 A. I believe so, yes, sir.

11 Q. All right. Are you familiar with the George  
12 Floyd case?

13 A. Yes, I am.

14 Q. Where a man died from a police officer  
15 putting his weight on a portion of his neck -- on  
16 the back of his neck? You saw that?

17 A. Yes.

18 Q. He told them he couldn't breathe, he didn't  
19 lift up. The man died after nine seconds.  
20 Mr. Tilman could have died from Billy putting his  
21 weight on the back of his shoulders, correct?

22 A. I'm sorry?

23 Q. Had he not let up in time this man could  
24 have died, correct?

25 A. No.

1 Q. You don't think he could have?

2 A. No.

3 Q. After he released pressure, said he was out  
4 of breath, couldn't breathe, you don't think in  
5 that -- (inaudible) -- Mr. Tilman would have died?

6 A. I mean, I guess he could have, you know, but  
7 that's not what happened. So we followed the right  
8 procedure. Whenever he said I'm having trouble, I  
9 was, like, hey, let's put him up.

10 Q. What was the purpose of him being on his  
11 back in the first place?

12 A. He wasn't on his back. He was on his front.

13 Q. On the back of his shoulders. What was the  
14 purpose of Billy Lewis putting weight on the back of  
15 his shoulders?

16 A. He was trying to get up and we was -- and  
17 keep his hands in front of him, you know, toward his  
18 waistband. We was trying to getting his hands and  
19 arms back. Once we got his arms back behind his  
20 back and Justin got him in handcuffs then we just we  
21 sat him on up.

22 Q. Y'all start waylaying him then after you put  
23 him handcuffs?

24 A. Started what?

25 Q. Waylaying him?

1 A. No, no. Nobody waylaid anybody.

2 Q. You understand what waylay means?

3 A. Well, I can remember that term as a kid.

4 Q. Okay. All right. So you believe he made

5 that portion up about the beating after being in

6 handcuffs?

7 A. Yes.

8 Q. Was the beating before handcuffs took place?

9 A. No.

10 Q. So you're saying there was no beating?

11 A. There was no beating.

12 Q. The only pressure came from Billy Lewis

13 being on the back of his shoulders?

14 A. Yes.

15 Q. Nobody punched him, stomped him, kicked him?

16 A. No, sir.

17 Q. How did his mouth get injured?

18 A. I don't recall. Probably because I

19 wrecked -- let me walk through that part. First he

20 hit me with his vehicle. He hit me and run me off

21 the road. I was able to regain control. Then once

22 we started going back southbound then I rammed him

23 with my vehicle to stop him and he was unrestrained

24 this entire time. And once he ended up on the

25 shoulder he started to try to go again and Agent Ivy

1 hit him with a Dodge pickup in the driver door.

2 Keep in mind, he's unrestrained the entire time.  
3 When I come around the front, remember he was almost  
4 in the center and his head was up toward the -- by  
5 the windshield, like, up towards the windshield.  
6 And I mean, he bounced around inside of that car  
7 like a pinball I would say.

8 Q. Do you think it's more believable he may  
9 have hurt his lip by the wrecks or --

10 A. Yes, sir.

11 Q. You can't say for certain how he hurt his  
12 lip, can you?

13 A. I know he was not beaten. I can you tell  
14 you he was not beaten by anybody prior to handcuffs,  
15 post handcuffs or anything of that matter.

16 Q. But the sheriff did tell y'all to beat him?

17 A. He did.

18 Q. All right. So we're going to believe that  
19 y'all didn't obey the sheriff?

20 A. We did not. I mean --

21 Q. Why should the jury believe you didn't obey  
22 the sheriff?

23 A. I don't know. I can't answer that question  
24 but it didn't happen.

25 Q. You know Mississippi's history with racism,

1 don't you?

2 A. I do.

3 Q. Why should anybody believe these white  
4 officers did not beat this black man at the order of  
5 a sheriff?

6 A. I mean, we try to obtain -- I mean, we know  
7 right from wrong. And think about this, he got on  
8 the radio and said it. There's already going to  
9 be -- I mean, God, the sheriff said that on the  
10 radio. So, I mean, you already know it's coming  
11 down the pipe. We have frivolous things come up all  
12 over the place much less when the sheriff gets on  
13 the radio and says do it. We already knew there  
14 would be eyes on this.

15 And he didn't need it that day. He didn't  
16 warrant it. Of course, it was aggravating, you  
17 know. I mean, he run me off the road, this and this  
18 but he did not -- it didn't warrant that.

19 Q. He never struck you with his hand?

20 A. No.

21 Q. Never tried to shoot you?

22 A. No. Well, if he could have got his hands on  
23 that gun in the floorboard I believe he might have  
24 would have tried something because he was reaching  
25 the entire time.

1 Q. He never pointed a gun at you, did he?

2 A. He did not.

3 Q. Okay. We want to talk about facts, not what

4 could've, should've, would've, what actually did

5 happen?

6 A. Yes, sir.

7 Q. You didn't have a black eye?

8 A. No.

9 Q. Bloody nose?

10 A. No, sir.

11 Q. Any scrapes?

12 A. No, sir.

13 Q. You went home safely to your wife?

14 A. I did.

15 Q. Your family? This man had to have a

16 hospital visit, correct?

17 A. I don't recall.

18 Q. Were you under the influence of any drugs or

19 alcohol that would affect your memory that night?

20 A. No, sir.

21 Q. Why don't you recall a lot of things?

22 A. Do what now?

23 Q. You're 35 years of age. What's wrong with

24 your memory? You told me several times you don't

25 recall several things.

1 A. I don't recall.

2 Q. You don't recall what's wrong with you?

3 A. I don't recall.

4 MS. MALONE: I think you're  
5 mischaracterizing the testimony. I am going to  
6 object. You have not laid any foundation or asked  
7 him if he had any personal knowledge about whether  
8 medical personnel were called to the scene.

9 I think you're mischaracterizing the  
10 testimony. I'm going to object.

11 BY MR. MOORE:

12 Q. You said you were there the entire time?

13 A. Yes, sir.

14 Q. Did you see any medical personnel or  
15 ambulance personnel arrive on the scene?

16 A. No, sir.

17 Q. Did you ever learn of him going to the  
18 hospital after this incident?

19 A. I don't recall. I honestly did not have  
20 that conversation with anybody.

21 Q. Did you ever speak with the sheriff, Sheriff  
22 Kemp, about his statement over the radio?

23 A. I did not.

24 Q. Why?

25 A. Because I just did not.

1 Q. You're used to that type of thing  
2 transpiring?

3 A. No, sir.

4 Q. But yet instead you didn't talk to the  
5 sheriff to see what was going on in his head?

6 A. No, sir.

7 Q. Do you think the sheriff was off his rocker?

8 A. No, sir.

9 Q. It was normal?

10 A. Do what now?

11 Q. You thought it was perfectly normal?

12 A. At that individual spot, probably not.

13 Q. Were you shocked when you heard the words  
14 come over the radio?

15 A. Yes, sir, I was.

16 Q. How did you respond?

17 A. Well, I was driving 100 miles an hour. I  
18 was focused on your client reaching for a gun in the  
19 passenger floorboard. I didn't put much thought  
20 into that. My job at that point was to stop him  
21 from creating a danger to us as well as the motoring  
22 public being also the school traffic that was about  
23 to leave Quitman school district. That's what my  
24 goal was. My goal that day was to stop him from  
25 harming me, my colleagues, the motoring public and

1 to apprehend him safely and that is exactly what we  
2 did.

3 Q. That's the same thing the sheriff told you  
4 to do, shut him down and beat his ass?

5 A. We did not beat his ass but we did shut him  
6 down. And if I had to do it over with again I would  
7 do the exact same thing over again.

8 Q. All right.

9 A. I would disobey the order that the sheriff  
10 gave but I would shut him down just like we did. I  
11 stand behind it.

12 Q. Do you regret the sheriff made that comment  
13 about beating his ass?

14 A. I do.

15 Q. -- (inaudible) -- sheriff made that comment?

16 A. I do. I agree. I agree with you 100  
17 percent, counselor.

18 Q. With Mississippi's sorted history I don't  
19 know if you're going to find a jury that's going to  
20 believe y'all didn't beat his ass at the sheriff's  
21 command. Do you?

22 A. I cannot answer that question, sir. We all  
23 you never know what a jury may or may not do.

24 Q. You never know. We never, never know.

25 What do you do as an affairs person for the

1 highway patrol?

2 A. I'm a liaison between the Department of  
3 Public Safety and the legislature.

4 Q. What qualifies you for that position?

5 A. I'm a people person I guess and my  
6 experience in law enforcement. I don't mind talking  
7 to people.

8 Q. All right. You have the gift of gab?

9 A. Yes, sir.

10 Q. If that's a gift.

11 A. That's a gift. I consider that a  
12 compliment, sir.

13 Q. Okay. When the legislature is not in  
14 session what are you doing?

15 A. We assist any legislator in anything they  
16 have going on and we have -- whatever the  
17 commissioner of public safety needs us to do, it  
18 could be a variety of things, just never can tell.

19 Q. You have one of those good jobs?

20 A. I do. I do have a good job, yes, sir.

21 Q. All right. Have all your answers been  
22 truthful?

23 A. Yes, sir, they have.

24 Q. Is there anything you're dying to tell me  
25 that I did not ask you?

1 A. No, sir.

2 MR. MOORE: I tender the witness.

3 MS. MALONE: I have no questions for this  
4 witness. Thank you.

5 (AND FURTHER DEPONENT SAITH NOT; SIGNATURE NOT  
6 WAIVED.)

7 (WHEREUPON, THE DEPOSITION WAS CONCLUDED AT  
8 11:42 A.M.)

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1 C E R T I F I C A T E  
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3 STATE OF MISSISSIPPI:  
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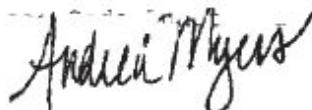
5 COUNTY OF UNION:  
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7 I, ANDREA C. MYERS, CCR, Board Certified  
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9 do hereby certify that the above deposition was  
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11 accurate record to the best of my knowledge, skills,  
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13 I further certify that I am not related to  
14 nor an employee of counsel or any of the parties to  
15 the action, nor am I in any way financially  
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1

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2

TO THE ORAL DEPOSITION OF

3

<WITNESS NAME>

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Volume 1 of 1

5

<DATE>

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PAGE	LINE	CHANGE	REASON
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Page 44

1           I,                                  , have read the foregoing  
2 deposition and hereby affix my signature that same is  
3 true and correct, except as noted above.  
4  
5

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<WITNESS NAME>

6 STATE OF \_\_\_\_\_)  
7 COUNTY OF \_\_\_\_\_)

8           Before me, \_\_\_\_\_, on this  
9 day personally appeared <WITNESS NAME>, known  
10 to me (or proved to me under oath or through \_\_\_\_\_  
11 (description of identity card or other document) to be  
the person whose name is subscribed to the foregoing  
instrument and acknowledged to me that they executed  
the same for the purposes and consideration therein  
expressed.

12           (Seal) Given under my hand and seal of office  
13 this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
14

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15           Notary Public in and for the  
16 State of \_\_\_\_\_  
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1 jmalone@aabalegal.com

2 October 21, 2021

3 RE: Tilman, Marquis v. Clarke County, Et Al.

4 DEPOSITION OF: Anthony Chancelor (# 4810408)

5 The above-referenced witness transcript is  
6 available for read and sign.

7 Within the applicable timeframe, the witness  
8 should read the testimony to verify its accuracy. If  
9 there are any changes, the witness should note those  
10 on the attached Errata Sheet.

11 The witness should sign and notarize the  
12 attached Errata pages and return to Veritext at  
13 errata-tx@veritext.com.

14 According to applicable rules or agreements, if  
15 the witness fails to do so within the time allotted,  
16 a certified copy of the transcript may be used as if  
17 signed.

18 Yours,

19 Veritext Legal Solutions

20  
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Page 46

[& - back]

<p><b>&amp;</b></p> <p><b>&amp; 3:10</b></p> <p><b>1</b></p> <p><b>1 4:9 22:6,9 44:2,2</b></p> <p><b>10 1:5 30:17</b></p> <p><b>100 39:17 40:16</b></p> <p><b>11 15:16</b></p> <p><b>11:00 2:4</b></p> <p><b>11:42 42:8</b></p> <p><b>12-31-2021 43:19</b></p> <p><b>1730 22:20,21</b></p> <p><b>1834 43:18</b></p> <p><b>2</b></p> <p><b>2004 13:2 15:25</b></p> <p><b>2006 16:1</b></p> <p><b>2007 14:12</b></p> <p><b>2012 17:14</b></p> <p><b>2014 16:3</b></p> <p><b>2018 16:8</b></p> <p><b>2019 21:17</b></p> <p><b>2021 1:16 2:2 46:2</b></p> <p><b>20s 28:12</b></p> <p><b>21 46:2</b></p> <p><b>214 3:10</b></p> <p><b>22 4:9</b></p> <p><b>236 1:23 3:18 43:19</b></p> <p><b>26634 43:18</b></p> <p><b>2:00 23:8</b></p> <p><b>3</b></p> <p><b>3/21/19 16:16 21:10,16,25 23:12</b></p> <p><b>30 1:16</b></p> <p><b>305 6:17</b></p> <p><b>306 3:4</b></p> <p><b>30th 2:2</b></p> <p><b>35 7:19 37:23</b></p> <p><b>38103 1:23 3:19 43:20</b></p>	<p><b>38902 3:5</b></p> <p><b>39330 6:18</b></p> <p><b>39602 3:11</b></p> <p><b>3:00 23:8</b></p> <p><b>4</b></p> <p><b>43 4:25</b></p> <p><b>45 23:15</b></p> <p><b>4810408 44:25 46:4</b></p> <p><b>5</b></p> <p><b>5 4:3</b></p> <p><b>5/18 7:17</b></p> <p><b>514 23:15</b></p> <p><b>5:30 22:20,21,21</b></p> <p><b>6</b></p> <p><b>601-409-0157 7:21</b></p> <p><b>8</b></p> <p><b>86 7:17</b></p> <p><b>9</b></p> <p><b>9-1-1 15:25</b></p> <p><b>901-523-8974 1:24 3:19</b></p> <p><b>a</b></p> <p><b>a.m. 2:4 42:8</b></p> <p><b>aabalegal.com 46:1</b></p> <p><b>ability 43:7</b></p> <p><b>able 24:19 28:5 30:13 34:21</b></p> <p><b>academy 14:6,10 14:16 18:1</b></p> <p><b>accidents 30:17</b></p> <p><b>accuracy 46:8</b></p> <p><b>accurate 43:6</b></p> <p><b>accused 18:22</b></p> <p><b>acknowledged 45:10</b></p> <p><b>action 17:21 43:9</b></p>	<p><b>adams 1:23 3:18 43:19</b></p> <p><b>address 6:16,19,20</b></p> <p><b>adult 7:9 8:22</b></p> <p><b>affair 19:3</b></p> <p><b>affairs 15:4 40:25</b></p> <p><b>affect 37:19</b></p> <p><b>affix 45:2</b></p> <p><b>afternoon 23:4,6</b></p> <p><b>afterward 12:15</b></p> <p><b>age 37:23</b></p> <p><b>agency 43:14</b></p> <p><b>agent 23:13 34:25</b></p> <p><b>aggravating 36:16</b></p> <p><b>ago 6:6</b></p> <p><b>agree 40:16,16</b></p> <p><b>agreement 5:17</b></p> <p><b>agreements 46:14</b></p> <p><b>ahead 9:8</b></p> <p><b>al 1:6 46:3</b></p> <p><b>alcohol 37:19</b></p> <p><b>alias 6:14</b></p> <p><b>allen 3:10,10,10</b></p> <p><b>allotted 46:15</b></p> <p><b>allow 5:20</b></p> <p><b>alpha 1:22 3:17</b></p> <p><b>ambulance 38:15</b></p> <p><b>andrea 3:18 5:13 43:4,18</b></p> <p><b>ansel 8:10</b></p> <p><b>answer 5:13,21 6:4 18:10 35:23 40:22</b></p> <p><b>answers 41:21</b></p> <p><b>anthony 1:15 2:1 4:3 5:1 6:12 22:6 46:4</b></p> <p><b>anybody 28:5 30:22 34:1 35:14 36:3 38:20</b></p>	<p><b>apartment 20:8</b></p> <p><b>apologize 16:12</b></p> <p><b>apparently 22:24</b></p> <p><b>appear 30:1</b></p> <p><b>appeared 45:8</b></p> <p><b>applicable 46:7,14</b></p> <p><b>appointed 15:10</b></p> <p><b>appreciate 19:14</b></p> <p><b>apprehend 40:1</b></p> <p><b>approximately 2:4 23:1 32:3</b></p> <p><b>area 9:1,19 10:5 11:1 24:2</b></p> <p><b>arms 33:19,19</b></p> <p><b>arrested 11:10</b></p> <p><b>arrive 38:15</b></p> <p><b>arts 13:16</b></p> <p><b>asked 22:12 38:6</b></p> <p><b>asking 5:8</b></p> <p><b>ass 25:24 26:11,14 26:21 27:17,25 28:20 30:19 40:4 40:5,13,20</b></p> <p><b>assaulted 24:21,24</b></p> <p><b>assist 41:15</b></p> <p><b>associate 20:16</b></p> <p><b>assume 6:3</b></p> <p><b>attached 46:10,12</b></p> <p><b>audio 25:24</b></p> <p><b>aunts 9:12 10:2</b></p> <p><b>available 46:6</b></p> <p><b>avenue 1:23 3:18 43:19</b></p> <p><b>b</b></p> <p><b>back 16:3,6,8,11 23:17 30:22 31:3 31:4,8,9,11,16,17 31:23 32:16,21 33:11,12,13,14,19 33:19,20 34:13,22</b></p>
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[bad - could've]

<b>bad</b> 10:22 <b>balances</b> 17:12 <b>bankruptcy</b> 12:17 <b>barry</b> 18:17 <b>based</b> 28:20 <b>basically</b> 11:5 <b>basketball</b> 13:6 <b>beat</b> 25:24 26:11 26:14,21 27:17,25 28:20 30:19 35:16 36:4 40:4,5,20 <b>beaten</b> 35:13,14 <b>beating</b> 34:5,8,10 34:11 40:13 <b>beg</b> 25:18 <b>beginning</b> 2:4 <b>behalf</b> 2:2 5:9 <b>believable</b> 35:8 <b>believe</b> 24:20 32:10 34:4 35:18 35:21 36:3,23 40:20 <b>ben</b> 23:18 <b>best</b> 43:6 <b>better</b> 26:25 28:2 28:3 <b>bigger</b> 32:8 <b>billy</b> 24:14,18 31:3 31:7,21 32:3,5,20 33:14 34:12 <b>birth</b> 7:16 <b>bit</b> 6:5 <b>black</b> 19:5,18 20:5 21:1 36:4 37:7 <b>blank</b> 10:22 <b>bloody</b> 37:9 <b>bo</b> 20:7,17,18 <b>board</b> 43:4,11 <b>body</b> 23:25 29:9 30:1	<b>bounced</b> 35:6 <b>branch</b> 13:19 <b>branscome</b> 3:4 <b>break</b> 5:19,20,22 <b>breath</b> 30:20 33:4 <b>breathe</b> 32:18 33:4 <b>breathing</b> 30:11 30:13,15 <b>breeland</b> 3:10 <b>brookhaven</b> 3:11 <b>brother</b> 8:7,10,16 <b>bunch</b> 19:21 <b>business</b> 22:19  <b>c</b> <b>c</b> 3:1,18 43:1,1,4 43:18 <b>call</b> 17:1,5 22:17 <b>called</b> 17:4 38:8 <b>calls</b> 18:10 <b>camera</b> 29:9 <b>cameras</b> 29:11 <b>car</b> 35:6 <b>card</b> 45:9 <b>care</b> 22:19 <b>career</b> 14:24 <b>carlos</b> 3:3 5:7 <b>case</b> 18:25 32:12 <b>causing</b> 25:12 <b>ccr</b> 43:4,12,18 <b>cell</b> 17:2 <b>center</b> 24:6 31:12 35:4 <b>certain</b> 19:12,13 19:15 35:11 <b>certainty</b> 19:14 <b>certificate</b> 4:25 <b>certified</b> 43:4 46:16 <b>certify</b> 43:5,8,11 43:13	<b>chancellor</b> 1:15 2:1 4:3 5:1 6:12 7:4 8:3,20 9:4,16,17 9:21,23 11:23 46:4 <b>chancellor's</b> 22:7 <b>chancellors</b> 11:6 <b>change</b> 44:4 <b>changes</b> 44:1 46:9 <b>charles</b> 19:24 20:1 <b>chase</b> 22:22,23 <b>checks</b> 17:11 <b>chest</b> 24:3 25:13 <b>chief</b> 18:17 <b>children</b> 6:25 7:9 7:11,13,25 12:3 <b>city</b> 23:14 30:5 <b>civil</b> 2:7 <b>claim</b> 12:19,22 <b>clark</b> 10:23,23,23 <b>clarke</b> 1:6 7:23,24 8:8 9:2,16,17,18 12:6 14:18,19 15:18 18:5 46:3 <b>clarks</b> 10:25 <b>clay</b> 9:17 <b>clear</b> 6:10 15:21 31:25 <b>client</b> 39:18 <b>clovix</b> 9:4 <b>cochran</b> 3:4 <b>colleagues</b> 19:15 31:2 39:25 <b>collectively</b> 15:21 <b>college</b> 13:7,8,10 13:11 17:25 <b>colonel</b> 15:11 <b>come</b> 16:8 20:5 35:3 36:11 39:14 <b>comes</b> 22:18	<b>coming</b> 36:10 <b>command</b> 26:16 28:13,15,20 40:21 <b>comment</b> 40:12,15 <b>commissioner</b> 41:17 <b>community</b> 13:11 17:25 <b>comp</b> 12:19 <b>compensation</b> 12:21 <b>competency</b> 2:11 <b>complete</b> 14:13 <b>compliment</b> 41:12 <b>concluded</b> 42:7 <b>conference</b> 2:5 <b>consent</b> 2:3 <b>consider</b> 20:24 31:11,14 41:11 <b>consideration</b> 45:10 <b>continue</b> 5:13 <b>control</b> 28:4,6 34:21 <b>conversation</b> 38:20 <b>convicted</b> 11:8 <b>convoluted</b> 16:12 <b>cooper</b> 10:4 <b>copy</b> 46:16 <b>corporation</b> 1:22 3:17 <b>correct</b> 26:4 27:6 28:2,6,15,17 30:20 31:10,17,23 32:1 32:21,24 37:16 45:3 <b>correctly</b> 5:14 <b>cough</b> 6:6,7 <b>could've</b> 37:4
--	--	--	--

[counsel - following]

<b>counsel</b> 2:4 22:10 43:9	14:1 22:6,9 42:7 43:5 44:1 45:2 46:4	<b>dying</b> 41:24 <b>e</b> <b>e</b> 3:1,1,3 43:1,1 <b>earlier</b> 22:23 23:2 <b>eastern</b> 1:2 <b>eat</b> 19:24 <b>education</b> 17:24 <b>eight</b> 12:2 <b>emily</b> 11:20,23 <b>employee</b> 43:9 <b>ended</b> 34:24 <b>enforcement</b> 14:6 14:9,15,24 17:25 29:15 41:6 <b>enterprise</b> 6:17 7:22 8:4,6 12:6,25 <b>entire</b> 28:24 29:1 34:24 35:2 36:25 38:12 <b>errata</b> 46:10,12,13 <b>esq</b> 3:3,9 <b>et</b> 1:6 46:3 <b>eventually</b> 16:10 <b>everybody</b> 9:18 <b>evidenced</b> 43:12 <b>evidently</b> 9:5 <b>exact</b> 40:7 <b>exactly</b> 40:1 <b>examination</b> 4:1 5:4 <b>examined</b> 5:2 <b>excessive</b> 18:23 <b>excluding</b> 2:9 <b>exclusive</b> 19:16 <b>excuse</b> 6:5 <b>executed</b> 45:10 <b>exhibit</b> 4:6,9 22:6 22:9 <b>experience</b> 14:4 41:6	<b>expiration</b> 43:12 43:19 <b>expressed</b> 45:11 <b>eye</b> 37:7 <b>eyes</b> 25:13 29:20 36:14 <b>f</b> <b>f</b> 43:1 <b>face</b> 25:13 30:8,8 30:10 31:18 <b>facing</b> 24:15,15 <b>fact</b> 6:4 26:8 <b>facts</b> 37:3 <b>fails</b> 46:15 <b>fair</b> 6:4 <b>familiar</b> 32:11 <b>family</b> 20:16 37:15 <b>fast</b> 5:24 <b>father's</b> 9:4 <b>fault</b> 17:10,10 <b>fear</b> 27:8,10 <b>federal</b> 2:7 <b>feel</b> 17:9 27:12 <b>filed</b> 12:17,21 <b>financially</b> 43:9 <b>find</b> 27:12 40:19 <b>-fired</b> 16:19 <b>firm</b> 3:4,16 <b>first</b> 5:2 15:12 23:24,24 31:18 33:11 34:19 <b>five</b> 7:12,13 <b>floorboard</b> 36:23 39:19 <b>floyd</b> 32:12 <b>focused</b> 39:18 <b>folks</b> 10:10 <b>followed</b> 33:7 <b>following</b> 28:8 43:12
<b>d</b>  <b>dad's</b> 9:25 10:1 <b>danger</b> 39:21 <b>date</b> 7:15 16:15 43:12,19 44:3 <b>dated</b> 21:25 <b>day</b> 2:2 22:24 23:2 36:15 39:24 45:8 45:12 <b>dealings</b> 21:12 <b>dealt</b> 20:12 <b>defendant</b> 1:7 <b>defendants</b> 3:9 <b>deny</b> 26:9 <b>department</b> 15:2 15:19,23 16:15 18:6 41:2 <b>deponent</b> 42:5 <b>deposition</b> 1:11 2:1,6 5:10 13:21	1:2  <b>division</b> 1:2 <b>divorce</b> 12:7,8 <b>divorced</b> 12:9 <b>doctor</b> 31:13 <b>document</b> 21:22 22:8 45:9 <b>documents</b> 13:20 <b>dodge</b> 35:1 <b>doing</b> 6:9 41:14 <b>door</b> 35:1 <b>dove</b> 23:20 <b>drive</b> 3:4 <b>driver</b> 35:1 <b>driving</b> 39:17 <b>drugs</b> 37:18 <b>dude</b> 20:13 <b>duly</b> 5:2 43:11 <b>duties</b> 18:8		

[follows - keep]

<b>follows</b> 5:3 <b>force</b> 18:23 28:13 <b>forced</b> 16:21 <b>foregoing</b> 45:1,9 <b>forgot</b> 21:2 <b>formalities</b> 2:9 <b>forms</b> 2:9 <b>foundation</b> 38:6 <b>four</b> 15:21 19:25 <b>frame</b> 23:9 <b>friend</b> 20:24 <b>friends</b> 19:18 20:5 21:1 <b>frivolous</b> 36:11 <b>front</b> 23:19 33:12 33:17 35:3 <b>further</b> 42:5 43:8 43:11,13	38:10,17 39:5 40:19,19 41:16 <b>golf</b> 13:6 <b>good</b> 20:13 41:19 41:20 <b>governmental</b> 15:4 <b>graduate</b> 12:24 <b>grandmother</b> 9:6 9:7 <b>grandparents</b> 8:24 9:9,10 <b>great</b> 9:10 <b>grenada</b> 3:5 <b>ground</b> 5:12 24:1 30:23 31:18 <b>group</b> 19:16 <b>guess</b> 24:16 27:14 27:23 33:6 41:5 <b>gun</b> 36:23 37:1 39:18 <b>guy</b> 27:20	<b>harris</b> 20:7,14 <b>haynes</b> 19:24 <b>head</b> 23:24,24 35:4 39:5 <b>hear</b> 26:1 <b>heard</b> 26:6,7 39:13 <b>hearing</b> 2:13 <b>heat</b> 27:19,22 <b>henderson</b> 20:7 <b>hey</b> 33:9 <b>higgin</b> 15:11 <b>high</b> 12:24 13:3 15:25 23:16 <b>highway</b> 14:21 15:1,13 16:2,2,7 16:10 17:2,16,19 23:15 24:15 41:1 <b>history</b> 35:25 40:18 <b>hit</b> 23:16,25 25:4 34:20,20 35:1 <b>home</b> 21:1 37:13 <b>honestly</b> 38:19 <b>hospital</b> 29:14 37:16 38:18 <b>hour</b> 39:17 <b>house</b> 17:4 <b>huh</b> 28:1,1 <b>hung</b> 21:3 <b>hurt</b> 35:9,11	<b>incident</b> 16:15,18 22:3 23:11 38:18 <b>index</b> 4:1,6 <b>individual</b> 39:12 <b>influence</b> 37:18 <b>initiated</b> 23:13 <b>injured</b> 30:2 34:17 <b>injuries</b> 25:12 <b>inside</b> 17:4 35:6 <b>instrument</b> 45:10 <b>interaction</b> 29:15 <b>interactions</b> 21:9 21:21 <b>interested</b> 43:10 <b>internal</b> 19:3 <b>investigation</b> 19:3 <b>involving</b> 23:12 <b>irrelevancy</b> 2:11 <b>ivy</b> 23:13 34:25
<b>g</b>	<b>h</b>	<b>j</b>	
<b>gab</b> 41:8 <b>gary</b> 20:23 <b>general</b> 10:5 <b>gentleman</b> 23:16 <b>george</b> 32:11 <b>getting</b> 27:21 33:18 <b>gift</b> 41:8,10,11 <b>give</b> 5:12 9:3,14,21 <b>given</b> 5:10 17:13 45:11 <b>glad</b> 6:9 <b>go</b> 9:8 11:21 13:7 13:10,17 14:6 17:6 23:20 24:5 34:25 <b>goal</b> 39:24,24 <b>god</b> 36:9 <b>going</b> 5:14 10:14 16:2 21:21 22:5 23:18 25:23 34:22 35:18 36:8 38:5	<b>half</b> 15:20 <b>hand</b> 36:19 45:11 <b>handcuffed</b> 30:14 <b>handcuffs</b> 23:21 24:13,20,22,25 29:18 31:6 33:20 33:23 34:6,8 35:14,15 <b>hands</b> 24:5,8,9,19 31:5 33:17,18 36:22 <b>hanging</b> 6:7 <b>happen</b> 25:15,16 35:24 37:5 <b>happened</b> 24:11 30:6 33:7 <b>harming</b> 39:25	<b>jackson</b> 14:10 15:5 20:19,20,21 <b>jail</b> 23:22 <b>jason</b> 8:13,14 <b>jessica</b> 3:9 8:19,20 <b>jmalone</b> 46:1 <b>job</b> 14:15 16:19,23 17:22 18:8 27:13 39:20 41:20 <b>jobs</b> 41:19 <b>joey</b> 9:16 <b>joined</b> 23:14 <b>joking</b> 27:16 <b>jury</b> 10:14 35:21 40:19,23 <b>justice</b> 3:10 <b>justin</b> 24:20 33:20	
	<b>i</b>	<b>k</b>	
	<b>idea</b> 19:21 32:4 <b>identity</b> 45:9 <b>immateriality</b> 2:12 <b>impressionable</b> 28:12,14 <b>inaudible</b> 21:2 28:5 30:5 33:5 40:15	<b>keep</b> 33:17 35:2	

[kelly - need]

<b>kelly</b> 20:23	<b>leaving</b> 17:15,18	<b>mallory</b> 7:2 11:15	<b>mine</b> 7:14 20:25
<b>kemp</b> 25:23 26:8 38:22	<b>left</b> 14:16 22:24 23:1,14 24:18	<b>malone</b> 3:9 38:4 42:3	<b>minute</b> 10:24
<b>kemper</b> 10:12	<b>leg</b> 30:3	<b>man</b> 29:13 32:5,14 32:19,23 36:4 37:15	<b>minutes</b> 30:18
<b>kicked</b> 34:15	<b>legal</b> 46:19	<b>man's</b> 27:17	<b>mischaracterizing</b> 38:5,9
<b>kid</b> 34:3	<b>legislator</b> 41:15	<b>march</b> 21:17	<b>mississippi</b> 1:1 3:5 3:11 6:17 7:25 9:1 9:19,20 10:10
<b>kim</b> 8:3	<b>legislature</b> 41:3,13	<b>mark</b> 22:5	11:1 13:18 14:9 14:20 15:1 43:2,5 43:11
<b>kin</b> 11:5	<b>lewis</b> 20:7,17,18 24:14 31:3,21 33:14 34:12	<b>marked</b> 22:9	<b>mississippi's</b> 35:25 40:18
<b>kind</b> 17:7 21:9 24:14 27:21 29:13 30:12	<b>liaison</b> 41:2	<b>marquis</b> 1:3 5:8 21:5 23:11 46:3	<b>moment</b> 27:19,23
<b>knee</b> 31:7	<b>liberal</b> 13:16	<b>married</b> 7:7 8:12 8:16 10:20 11:14 11:15,22 12:1	<b>months</b> 6:21
<b>kneed</b> 25:8,10	<b>licensed</b> 43:11,12	<b>martins</b> 11:3,5,5	<b>moore</b> 3:3 4:3 5:6 5:7 22:11 38:11 42:2
<b>knew</b> 36:13	<b>licks</b> 29:3	<b>marvin</b> 20:7	<b>morning</b> 5:9 23:4
<b>know</b> 5:19,25 16:12 17:10 19:9 21:5,7,14 22:24 26:3,6,23 27:21 28:4,19,21,22 30:14,15 33:6,17 35:13,23,25 36:6 36:10,17 40:19,23 40:24,24	<b>lift</b> 32:19	<b>matter</b> 19:5 35:15	<b>mother</b> 9:5 10:1 10:19,22
<b>knowledge</b> 21:15 38:7 43:6	<b>lightest</b> 32:5	<b>matters</b> 2:11	<b>mother's</b> 10:2,3,17
<b>known</b> 45:8	<b>line</b> 24:16 44:4	<b>mbi</b> 20:2,3,11,22	<b>motoring</b> 39:21,25
<b>ks</b> 1:5	<b>lip</b> 35:9,12	<b>mean</b> 16:5 19:22 22:17 27:18,20 29:24,24 30:13,16 33:6 35:6,20 36:6 36:6,9,10,17	<b>mouth</b> 34:17
<b>l</b>		<b>means</b> 34:2	<b>mtp</b> 1:5
<b>lady</b> 11:19	<b>long</b> 6:19 7:7 12:1 15:8,15,18	<b>meant</b> 10:21	<b>myers</b> 3:18 43:4 43:18
<b>laid</b> 38:6	<b>look</b> 22:25	<b>medical</b> 38:8,14	<b>n</b>
<b>lauderdale</b> 10:8,9 10:10	<b>looked</b> 29:17,23	<b>member</b> 19:16	<b>n</b> 3:1 19:7,9
<b>law</b> 14:6,9,15,23 17:25 29:15 41:6	<b>lord</b> 21:3	<b>memory</b> 37:19,24	<b>name</b> 5:7 6:11,13 7:1,3,5 8:18 9:14 10:3,15,17 11:20 11:24 43:12 44:2 45:5,8,9
<b>laws</b> 10:5 11:1	<b>lot</b> 16:4 37:21	<b>memphis</b> 1:23 3:19 43:20	<b>names</b> 8:9 9:3,21 11:2 19:23
<b>lawsuit</b> 5:8 12:13	<b>lucky</b> 11:19 15:7	<b>meridian</b> 13:11 17:25	<b>near</b> 31:5
<b>lawyer</b> 14:2	<b>lunch</b> 19:24	<b>middle</b> 17:3	<b>neck</b> 32:15,16
<b>laying</b> 31:17	<b>m</b>		<b>need</b> 5:19 29:8 36:15
<b>learn</b> 38:17	<b>madeline</b> 8:10,12	<b>miles</b> 39:17	
<b>leave</b> 39:23	<b>maiden</b> 7:5 10:3 11:24	<b>military</b> 14:4 18:3 18:4	
	<b>main</b> 11:6	<b>miller</b> 8:10,13	
	<b>major</b> 13:14	<b>mind</b> 10:22 20:6 35:2 41:6	

[needs - randy]

<b>needs</b> 41:17	20:5,17 21:9	<b>personal</b> 38:7	<b>product</b> 43:14
<b>negative</b> 28:1	22:20 23:10,25	<b>personally</b> 21:13	<b>proved</b> 45:8
<b>nephews</b> 8:22	25:23 26:3 27:1	45:8	<b>provisions</b> 2:7
<b>never</b> 12:16 19:12	27:12 31:2,25	<b>personnel</b> 38:8,14	<b>public</b> 15:2 39:22
36:19,21 37:1	34:4 37:3 41:13	38:15	39:25 41:3,17
40:23,24,24,24	<b>old</b> 7:18	<b>phone</b> 7:20 17:2	45:15
41:18	<b>once</b> 11:18 33:19	<b>pickup</b> 35:1	<b>punched</b> 25:6
<b>nieces</b> 8:22	34:21,24	<b>pinball</b> 35:7	34:15
<b>night</b> 17:1,3 37:19	<b>ones</b> 9:25	<b>pipe</b> 36:11	<b>purpose</b> 33:10,14
<b>nine</b> 32:19	<b>operator</b> 15:25	<b>place</b> 16:18 22:22	<b>purposes</b> 45:10
<b>no.2:20</b> 1:5	<b>opportunity</b> 16:10	22:23 33:11 34:8	<b>pursuant</b> 2:3,6
<b>normal</b> 39:9,11	<b>opposite</b> 24:15	36:12	<b>pursuit</b> 21:16,18
<b>north</b> 10:13	<b>oral</b> 44:1	<b>plaintiff</b> 1:4 2:3	23:13,14
<b>nose</b> 37:9	<b>order</b> 36:4 40:9	3:3	<b>put</b> 24:22,24 29:18
<b>notarize</b> 46:11	<b>outcome</b> 43:10	<b>planning</b> 13:17	30:22 31:3,3,5
<b>notary</b> 45:15	<b>p</b>	<b>play</b> 13:3,5	33:9,22 39:19
<b>note</b> 46:9	<b>p</b> 3:1,1	<b>point</b> 17:16,19	<b>putting</b> 32:15,20
<b>noted</b> 45:3	<b>p.m.</b> 22:20	39:20	33:14
<b>notice</b> 2:3	<b>page</b> 44:4	<b>pointed</b> 37:1	<b>q</b>
<b>number</b> 7:20	<b>pages</b> 46:12	<b>points</b> 23:16	<b>qualifies</b> 41:4
43:12	<b>paid</b> 27:1,4	<b>police</b> 32:14	<b>question</b> 5:21,22
<b>o</b>	<b>papers</b> 18:12,13	<b>portion</b> 23:25 30:1	6:1,3 35:23 40:22
<b>oath</b> 32:1 45:8	<b>paramedic</b> 29:14	32:15 34:5	<b>questions</b> 5:9 42:3
<b>obey</b> 35:19,21	<b>pardon</b> 25:18	<b>position</b> 15:3,6,12	<b>quit</b> 17:2
<b>object</b> 38:6,10	<b>parents</b> 8:2,5	15:17 16:11 41:4	<b>quitman</b> 8:8,15
<b>objections</b> 2:10	<b>part</b> 17:18 29:24	<b>possible</b> 10:14	23:14 39:23
<b>obtain</b> 36:6	34:19	<b>post</b> 17:24 35:15	<b>r</b>
<b>occasions</b> 21:4	<b>parties</b> 43:9	<b>potentially</b> 28:9	<b>r</b> 3:1 43:1
<b>october</b> 46:2	<b>passenger</b> 39:19	<b>preparation</b> 13:21	<b>racially</b> 19:16
<b>office</b> 15:24 16:1,4	<b>paternal</b> 9:6,7	14:1	<b>racism</b> 35:25
16:6,9,17 20:24	<b>patrol</b> 14:21 15:1	<b>presented</b> 2:13	<b>rack</b> 21:12
45:11	15:13 16:2,2,7,10	<b>pressure</b> 33:3	<b>radio</b> 25:24 26:1,8
<b>officer</b> 18:14	16:11 17:2,16,19	34:12	27:18 36:8,10,13
26:17 32:14	18:10 41:1	<b>prior</b> 11:14 12:12	38:22 39:14
<b>officers</b> 14:10 36:4	<b>pending</b> 5:21	16:1 23:3 30:6	<b>raised</b> 26:25
<b>okay</b> 5:12 6:1 7:11	<b>people</b> 28:8,11,12	35:14	<b>rammed</b> 23:18,18
7:15 8:5,16 9:20	41:5,7	<b>probably</b> 15:20	34:22
9:24 11:4,7 12:5	<b>percent</b> 40:17	23:15 34:18 39:12	<b>ran</b> 27:24
12:10 13:5,20	<b>perfectly</b> 39:11	<b>procedure</b> 2:8	<b>randy</b> 15:11
14:22 15:12,18	<b>person</b> 27:1,4	33:8	
16:19 18:22 19:14	40:25 41:5 45:9		

[rank - sir]

<b>rank</b> 18:5	<b>require</b> 29:13	<b>saying</b> 25:24 34:10	<b>should've</b> 37:4
<b>reaching</b> 36:24	<b>reserved</b> 2:12	<b>says</b> 22:20,25 23:1	<b>shoulder</b> 31:8,9,11
39:18	<b>reside</b> 12:5	36:13	31:15,16,17,22,23
<b>read</b> 45:1 46:6,8	<b>resign</b> 16:21	<b>scene</b> 38:8,15	34:25
<b>reason</b> 6:8 17:15	<b>respond</b> 39:16	<b>school</b> 12:24 13:3	<b>shoulders</b> 32:21
44:4	<b>response</b> 28:1	15:25 16:2 23:2,5	33:13,15 34:13
<b>recall</b> 21:11 23:11	<b>responsible</b> 22:18	39:22,23	<b>show</b> 21:21
29:16 30:9 31:7	<b>retained</b> 22:10	<b>scratches</b> 37:11	<b>shut</b> 26:11 40:4,5
34:18 37:17,21,25	<b>return</b> 46:12	<b>seal</b> 45:11,11	40:10
38:1,2,3,19	<b>review</b> 13:21	<b>secondary</b> 17:24	<b>shy</b> 23:15
<b>record</b> 43:6	<b>right</b> 6:16,21,22	<b>seconds</b> 32:19	<b>siblings</b> 8:6
<b>reference</b> 22:3	7:15 8:22 9:1,6,14	<b>see</b> 24:8,9 30:25	<b>side</b> 9:25 10:1,2
<b>referenced</b> 22:8	10:9,25 11:21	31:6 38:14 39:5	24:17
46:5	12:7,15 13:7,15,23	<b>september</b> 1:16	<b>sign</b> 46:6,11
<b>refused</b> 27:2,5	15:24 21:15 22:2	2:2	<b>signature</b> 2:10
<b>regain</b> 34:21	22:5,14 23:7,19	<b>serious</b> 27:16,21	21:23 42:5 43:18
<b>regret</b> 40:12	24:18 26:22,23	<b>seriously</b> 28:19	44:1 45:2
<b>related</b> 43:8	29:13,22 31:9,12	<b>serve</b> 18:12,13	<b>signed</b> 46:17
<b>relation</b> 23:11	32:11 33:7 34:4	<b>served</b> 15:16	<b>sir</b> 5:18,23 6:5,10
<b>relatives</b> 7:24	35:18 36:7 40:8	<b>service</b> 17:3 18:3,4	6:15 8:21,23 9:7
<b>released</b> 33:3	41:8,21	18:10	9:11,13 11:9,11,13
<b>remember</b> 21:12	<b>river</b> 6:17	<b>session</b> 41:14	12:14,16,18,20,23
21:12 23:2 29:17	<b>road</b> 6:17 15:16	<b>set</b> 30:14	13:24 14:5,14,20
29:22 30:9 34:3	23:17 27:20,24	<b>seven</b> 6:21	16:20,22,24 17:17
35:3	34:21 36:17	<b>severe</b> 25:12	17:20,23,23 18:2,4
<b>remove</b> 31:4	<b>rocker</b> 39:7	<b>shared</b> 20:8	18:13,15,19,21,24
<b>rental</b> 6:21	<b>ross</b> 24:20	<b>sheet</b> 46:10	19:1,4,6,8,11,13
<b>repeat</b> 5:25	<b>roy</b> 21:2	<b>sheriff</b> 14:18,19,23	19:17 20:23 21:17
<b>repeatedly</b> 25:12	<b>rules</b> 2:7 5:12	25:23 26:8 28:13	21:24 22:4,15,21
<b>rephrase</b> 6:1	46:14	35:16,19,22 36:5,9	23:9 24:23 25:1,3
<b>report</b> 18:16 21:19	<b>run</b> 23:16 27:20	36:12 38:21,21	25:5,9,11,14,16
22:12	34:20 36:17	39:5,7 40:3,9,12	27:9 28:7,10,16,18
<b>reported</b> 43:6	<b>s</b>	40:15	28:25 29:4,6,12,19
<b>reporter</b> 43:5,12	<b>s</b> 3:1	<b>sheriff's</b> 15:19,22	29:21 30:21,24
<b>reporter's</b> 4:25	<b>safely</b> 37:13 40:1	15:24 16:1,4,6,9	31:1,19 32:2,2,7
<b>reporters</b> 43:11	<b>safety</b> 15:2 41:3	16:14,17 18:6,8	32:10 34:16 35:10
<b>reporting</b> 1:22	41:17	20:24 21:16 40:20	37:6,10,12,20
3:16,17 43:14	<b>saith</b> 42:5	<b>shocked</b> 39:13	38:13,16 39:3,6,8
<b>represent</b> 5:7	<b>sat</b> 33:21	<b>shoot</b> 36:21	39:15 40:22 41:9
<b>reproduction</b>	<b>saw</b> 32:16	<b>shot</b> 23:19	41:12,20,23 42:1
43:14			

[sister - v]

sister 8:7,11	superior 26:16	30:6,7 33:1,4 35:8 36:7 38:4,9 39:7	travesty 28:17
skills 43:6	supervise 18:20	thought 10:21	treatment 29:14
smart 22:16,17	sure 19:24 23:20 27:19,22 31:25	39:11,19	29:14
smith 20:15,15	surnames 9:15	three 6:6 7:8,13 15:20 19:25 30:17	tree 24:16
solutions 46:19	surrounding 9:19	tilman 1:3 5:8,9 16:16 21:5 23:11 25:19 32:8,20	tried 36:21,24
somebody 31:2	sworn 5:2 18:14	33:5 46:3	trooper 15:14,15 15:16 17:6
sorry 10:23 16:4 32:22	<b>t</b>	time 22:22,23,24 22:25 23:1,3,9 24:10 27:4 28:24 29:1 32:23 34:24 35:2 36:25 38:12 46:15	trouble 30:12,15 33:8
sorted 40:18	<b>t</b> 43:1,1	timeframe 46:7	true 25:2 43:6 45:3
south 7:25 9:1,19 9:20 10:10 23:17	take 5:19,20 22:22 22:23	times 11:17 19:25 37:24	truth 26:4
southbound 34:22	taken 2:1,6 28:14	tire 23:19	truthful 41:22
southern 1:1 11:1	talk 5:15,16,24 37:3 39:4	tn 1:23	try 16:4 31:4 34:25 36:6
speak 13:25 38:21	talking 5:14,16 19:10 29:25 41:6	today's 13:21 14:1	trying 13:15 21:11 21:12 22:18 33:16 33:18
sports 13:3	tell 8:2 14:8,15 16:25 19:23 21:22 23:10 26:3 27:16 35:13,16 41:18,24	todd 7:6 10:15,16 10:18,19	two 12:4 16:7
spot 39:12	temper 28:4,6	todds 10:25	tx 46:13
stand 40:11	tendency 5:24	told 26:5 27:1,4 32:18 37:24 40:3	type 39:1
start 33:22	tender 42:2	tony 8:3	<b>u</b>
started 33:24 34:22,25	tennessee 3:19 43:20	top 22:25	unauthorized 43:15
state 6:11 13:18,19 43:2,5 45:6,15	tensed 24:12	torso 24:3	uncles 9:12 10:2
statement 4:9 13:22 21:19 22:2 22:7 38:22	term 34:3	total 15:20	underneath 24:6,7
states 1:1	terminated 27:8 27:10	traffic 23:3,4,4,6 39:22	understand 5:25 34:2
stern 27:15,18	terms 2:7	trained 26:19	understanding 32:1
stevens 11:20,25	tessa 20:7,14	training 14:10	understood 6:3
stomped 25:2 34:15	testified 5:3	transcript 43:6,13 46:5,16	union 43:3
stop 34:23 39:20 39:24	testimony 2:12 38:5,10 46:8	transfer 13:16 43:14	united 1:1
straight 30:14	thank 42:4	transpiring 39:2	university 13:15
street 3:10 13:18	thing 26:22,23 27:6 39:1 40:3,7		unrestrained 34:23 35:2
struck 36:19	things 36:11 37:21 37:25 41:18		upset 30:16
subject 19:2	think 10:24 11:2 20:12 25:17,19,21		<b>v</b>
subscribed 45:9			<b>v</b> 46:3
successfully 14:13			
sued 11:12 12:10 12:12,16			

[variety - zoom]

<b>variety</b> 41:18 <b>vehicle</b> 23:16,18 23:18,21,23 27:21 30:17 34:20,23 <b>vehicles</b> 29:11 <b>verbally</b> 5:13 <b>verify</b> 46:8 <b>veritext</b> 46:12,19 <b>veritext.com.</b> 46:13 <b>vice</b> 27:15 <b>video</b> 2:5 <b>virtually</b> 6:9 <b>visit</b> 21:1 37:16 <b>voice</b> 27:18 <b>voir</b> 10:15 <b>volume</b> 44:2 <b>vs</b> 1:5	<b>white</b> 18:17 36:3 <b>wife</b> 6:25 7:25 10:7 37:13 <b>wife's</b> 7:1 8:18 <b>windshield</b> 35:5,5 <b>witness</b> 2:10 42:2 42:4 44:2 45:5,8 46:5,7,9,11,15 <b>word</b> 19:7,9 <b>words</b> 23:10 39:13 <b>work</b> 15:4 16:3,6 20:1,10 43:14 <b>worked</b> 14:17,20 <b>worker's</b> 12:19,21 <b>working</b> 14:25 16:14,17 17:2 <b>works</b> 20:2,11,23 <b>would've</b> 23:7 24:17,18 26:5 37:4 <b>wreck</b> 17:4 30:4,5 <b>wrecked</b> 34:19 <b>wrecks</b> 35:9 <b>write</b> 17:8,13,21 22:12,14,16 <b>wrong</b> 29:20 30:3 36:7 37:23 38:2 <b>www.alpharepor...</b> 1:24	<b>z</b> <b>zoom</b> 2:5
<b>waist</b> 31:5 <b>waistband</b> 33:18 <b>waived</b> 2:10 42:6 <b>walk</b> 34:19 <b>want</b> 9:18 37:3 <b>wanting</b> 24:13 <b>warrant</b> 36:16,18 <b>way</b> 43:9 <b>waylay</b> 34:2 <b>waylaid</b> 34:1 <b>waylaying</b> 33:22 33:25 <b>we've</b> 21:3 <b>week</b> 19:25 30:6 <b>weeks</b> 6:6 <b>weigh</b> 32:3 <b>weight</b> 30:22 31:3 31:4,21 32:15,21 33:14 <b>went</b> 10:22 14:9 16:3,6,7,11 23:17 23:21 37:13	<b>y</b> <b>y'all</b> 7:7 26:14 33:22 35:16,19 40:20 <b>year</b> 13:1 15:9,22 16:9 <b>years</b> 7:8,13 12:2 15:17,21 16:7 37:23	

Mississippi Rules of Civil Procedure

Rule 30

Depositions Upon Oral Examination

(e) Submission to Witness; Changes; Signing.

When the testimony is taken by stenographic means, or is recorded by other than stenographic means as provided in subsection (b) (4) of this rule, and if the transcription or recording thereof is to be used at any proceeding in the action, such transcription or recording shall be submitted to the witness for examination, unless such examination is waived by the witness and by the parties. Any changes in form or substance which the witness desires to make shall be entered upon the transcription or stated in a writing to accompany the recording, together with a statement of the reasons given by the witness for making them.

Notice of such changes and reasons shall promptly be served upon all parties by the party taking the deposition. The transcription or recording shall then be affirmed in writing as correct by the witness, unless the parties by stipulation waive the affirmation. If the transcription or recording is not affirmed as correct by the witness within

thirty days of its submission to him, the reasons for the refusal shall be stated under penalty of perjury on the transcription or in a writing to accompany the recording by the party desiring to use such transcription or recording. The transcription or recording may then be used fully as though affirmed in writing by the witness, unless on a motion to suppress under Rule 32(d)(4) the court holds that the reasons given for the refusal to affirm require rejection of the deposition in whole or in part.

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